

Exhibit 1

Re: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

JULIE <juliedalessio@msn.com>

Mon 6/5/2017 11:17 AM

Sent Items

To:

Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>;

Cc:

Derek C. Chen <DChen@kbmlawyers.com>;

1 attachments (490 KB)

JOINT STATUS REPORT AND DISCOVERY PLAN draft 6:3:2017 copy.docx;

i had a hard time working with your draft, so i started over.

please review the attached and note anything that's not acceptable.

see in particular 4D, Privilege issues and 4F, need for discovery related orders.

thanks,

julie dalessio

206 324 2590

From: Jayne L. Freeman <JFreeman@kbmlawyers.com>

Sent: Thursday, June 1, 2017 10:21:37 AM

To: JULIE; LaHoma Walker

Cc: Derek C. Chen

Subject: RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

Ms. Dalessio: attached please find a revised DRAFT Joint Status Report and Discovery Plan per our FRCP 26 conference last week. If you propose further changes, go ahead and make them on the draft

re: PLAINTIFF's reply re: Motion to Seal records - Case 2:17-cv-00642-MJP

and send it back for our review so we can move towards a final draft for filing with the court. If you could use the "track changes" function that would be great. Thank you.

Jayne L. Freeman



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From: JULIE [mailto:juliedalessio@msn.com]

Sent: Monday, May 22, 2017 6:50 PM

To: LaHoma Walker <LWalker@kbmlawyers.com>

Cc: Jayne L. Freeman <JFreeman@kbmlawyers.com>; Derek C. Chen <DChen@kbmlawyers.com>

Subject: Re: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

thanks for doing that. i'll expect your call tomorrow at 10:30

julie dalessio

206 324 2590

From: LaHoma Walker <LWalker@kbmlawyers.com>

Sent: Monday, May 22, 2017 11:45:22 AM

To: juliedalessio@msn.com

Cc: Jayne L. Freeman; Derek C. Chen

Subject: Dalessio v. University of WA, Case No. 2:17-cv-00642-RSM

Ms. Dalessio:

re: PLAINTIFF's reply re: Motion to Seal records - Case 2:17-cv-00642-MJP

On behalf of Ms. Freeman, I am forwarding you a DRAFT version of a proposed Joint Status Report in Word format for review prior to your scheduled attorney conference tomorrow, May 23, at 10:30 a.m. Ms. Freeman asked me to provide this to you prior to the FRCP 26 conference to advise you of the University's likely positions on the issues the parties are to discuss as outlined in the court's Initial Scheduling Order (a copy is attached for your convenience).

Please note this is only a draft and intended only to provide an outline of the issues that will need to be addressed and finalized into this format with information from both parties. To the extent the parties may not agree on any of the issues as stated, it is being provided to you in Word format so you can easily add your position or other information regarding any of the issues into the document and return for formatting and finalization & filing once it is completed.

Thank you and all the best,

LaHoma Walker

Legal Assistant to
Derek C. Chen
Jayne L. Freeman
Kimberly J. Waldbaum
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KEATING, BUCKLIN & McCORMACK

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re: PLAINTIFF's reply re: Motion to Seal records - Case 2:17-cv-00642-MJP